

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JPS ACQUISITIONS, INC.,  
d/b/a JPS MFG. INC.,  
A Michigan Corporation,

Case No. 2:25-cv-10434

Plaintiff,

Hon. Stephen J. Murphy III

-v-

JOSEPH SZACON, TAMRA  
SZACON, and CUSTOM IND, INC.,  
f/k/a JS MFG & SALES, INC.  
LOLA CHOUINARD, and RANDY  
IHNS  
Defendant.

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**PROPOSED JOINT STATUS REPORT**

Pursuant to the Court's directive, the parties submit the following Joint Status Report:

**1. Meet and Confer**

On Thursday, May 22, 2025, the parties conferred in accordance with the Court's order requiring the submission of this Joint Status Report.

**2. Discovery and Initial Disclosures**

The parties discussed the scope and anticipated timing of discovery, including the exchange of mandatory initial disclosures pursuant to Rule 26(a)(1). The parties

are preparing a Joint Discovery Plan pursuant to Fed. R. Civ. P. 26(f), which shall be submitted under separate cover.

### **3. Preliminary Injunction**

The parties discussed Plaintiff's pending motion for preliminary injunction, which remains under consideration by the Court following its February 18, 2025, Order denying only the ex parte request for a temporary restraining order. [ECF No. 6] The Court has not yet entered a briefing schedule or hearing date. The parties anticipate the Court will schedule a hearing on the motion at its discretion and intend to proceed accordingly.

### **4. Case Management**

The parties are committed to cooperating on discovery and case management issues and will promptly advise the Court of any disputes that may require judicial intervention.

Additionally, the parties note that, as of the date of this filing, Defendant Randy Ihns has not entered an appearance or retained counsel in this matter. Accordingly, he did not participate in the meet and confer and is not a signatory to this Joint Status Report.

Respectfully submitted,

Conlin, McKenney & Philbrick, P.C.

/s/ Clyde R. Woods

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Date: June 2, 2025